

7. Accordingly, by this Motion, Elegran seeks a hearing on its Motion to Compel on shortened notice.

NOTICE


8. Pursuant to Bankruptcy Rule 9006(c)(1), the Court may shorten time with or without notice. The Debtor, all parties required to be served pursuant to Bankruptcy Rule 2002, and the Office of the United States Trustee have been served with a copy of this Motion to Shorten Time as well as the underlying Motion to Compel.

9. No previous request for the relief sought herein has been made by Elegran to this or any other Court.

WHEREFORE, Elegran respectfully requests that the Court (i) approve the request for the shortened notice period requested herein, and (ii) grant Elegran such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York
July 21, 2022

Respectfully submitted,
Law Office of Rachel S. Blumenfeld
Attorney for the Debtors


By: /s/ Rachel S. Blumenfeld
Rachel S. Blumenfeld
26 Court Street, Suite 2220
Brooklyn, NY 11242
Tel: (718) 858-9600

CONCLUSION

17. Based upon the foregoing, Elegran respectfully submits that the Motion should be granted and the Debtor should be required to pay Elegran's commissions from the sales proceeds at the 7th Street Closing.

WHEREFORE Elegran respectfully requests that the Court grant the Motion in its entirety together with such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York
July 21, 2022

Respectfully submitted,
Law Office of Rachel S. Blumenfeld

Attorney for the Debtors



By: /s/ Rachel S. Blumenfeld

Rachel S. Blumenfeld

26 Court Street, Suite 2220

Brooklyn, NY 11242

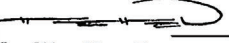
Tel: (718) 858-9600

against her in any jurisdiction. Ms. Blumenfeld further certifies that no discipline has ever been imposed against her in any jurisdiction.

As required by Rule 101.1(c)(2) and (3) of the Local Civil Rules for the United States District Court for the District of New Jersey and New Jersey Court Rule 1:28-2(a), I am having submitted contemporaneously herewith the filing fee of \$150.00 with this motion for *pro hac vice* admission.

CHARLES JUNTIKKA & ASSOCIATES

Dated: July 21, 2022
New York, New York

By: 
Hae Won Han, Esq.
30 Vesey Street, Suite 100
New York, NY 10007
Phone : (212) 315-3755
Fax: (212) 315-9032

I, Rachel S. Blumenfeld, hereby certify that the foregoing is true and correct to the best of my knowledge.

**LAW OFFICE OF RACHEL S. BLUMENFELD
PLLC**

/s/ Rachel S. Blumenfeld
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26 Court Street, Suite 2220
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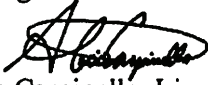
Attorneys for Elegran Real Estate

12. For all the foregoing reasons, Elegran submits that the Court should shorten notice on a hearing on this Motion and grant Elegran's motion to compel payment of its commission at the 7th Street Closing.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge, information and belief.

Dated: July 21, 2022
New York, New York

For Elegran Real Estate

By: 
Alexis Carpinello, Licensed Real Estate Salesperson